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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GREGORY WOCHOS, individually and on
12 behalf of all others similarly situated,

13 Plaintiff,

14 v.

15 TESLA, INC., ELON R. MUSK, DEEPAK
16 AHUJA, and JASON WHEELER,

17 Defendants.

Case No.: 3:17-cv-05828-CRB

**SCHEDULING STIPULATION AND
[PROPOSED] ORDER**

1 WHEREAS, by Order dated February 2, 2018 (ECF No. 21), Pursuant to Section
2 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), this Court
3 appointed Kurt Friedman as “Lead Plaintiff” in this securities class action and approved his selection
4 of The Rosen Law Firm, P.A., as Lead Counsel; and

5 WHEREAS, following the appointment of Lead Plaintiff and Lead Counsel, the parties have
6 met and conferred and agreed on a schedule for Lead Plaintiff to file an amended complaint and for
7 Defendants’ responses thereto;

8 NOW THEREFORE, the parties stipulate and agree as follows:

- 9
- 10 1. Lead Plaintiff shall file his Amended Complaint on or before March 23, 2015;
 - 11 2. Defendants shall answer or otherwise respond to the Amended Complaint on or before
12 May 25, 2018;
 - 13 3. If any Defendant files a motion to dismiss the Amended Complaint, Lead Plaintiff
14 shall file any opposition thereto on or before July 11, 2018;
 - 15 4. Any Defendant who files a motion to dismiss may file a reply on or before August 17,
16 2018.

17 Dated: February 9, 2018

FENWICK & WEST LLP

/s/ Jennifer Bretan

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Lead Counsel for Lead Plaintiff and the Putative Class

Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing this stipulation.

/s/ Jacob A. Goldberg
Jacob A. Goldberg (*pro hac vice*)

[PROPOSED] ORDER

Upon stipulation of the parties, and good cause appearing:

IT IS SO ORDERED.

Dated: February ____, 2018

The Honorable Charles R. Breyer
United States District Judge